

REMARKS

In the Office Action dated September 13, 2006, the drawings were objected to; the Specification was objected to; claims 7, 8, 13, and 14 were objected to; claims 1-7 and 9-14 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 4,424,862 (Munari); and claim 8 was rejected under § 103 over Munari in view of U.S. Patent No. 5,031,697 (Wellington).

**OBJECTION TO DRAWINGS**

Paragraph [016] on page 4 of the Specification has been amended to refer to reference numerals "20" and "64." Therefore, the drawing objection has been overcome.

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Amendment Dated December 8, 2006  
Reply to Office Action Mailed September 13, 2006

OBJECTION TO THE SPECIFICATION

The Abstract and Detailed Description sections of the Specification have been amended to address the objection.

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CLAIM OBJECTIONS

Claims 7, 8, 13, and 14 have been amended to address the objections.

REJECTIONS UNDER 35 U.S.C. §§ 102 AND 103

Independent claim 12 was rejected as being anticipated by Munari. Claim 12 recites a method for producing a well having a perforation interval proximate a formation, where the method comprises injecting *gas* into the well proximate the perforation interval.

Munari, on the other hand, discloses a device for injecting a *liquid*. See Munari, Abstract; 1:6, 20, 25; 2:67; 3:15, 24. In fact, the word “gas” is nowhere mentioned in Munari. Therefore, it is respectfully submitted that Munari does not disclose injecting gas into the well proximate the perforation interval.

Independent claim 13 is similarly allowable over Munari, which fails to disclose delivering gas into the well proximate the perforation interval via a gas injection tool to decrease the hydrostatic pressure of the accumulated liquid to a level sufficient to permit gas to be produced from the formation.

With respect to independent claim 1, Munari fails to disclose a *gas* injection apparatus, or a *gas* lift valve.

With respect to independent claim 7, Munari fails to disclose a *gas* lift system, and an injection tool adapted to inject *gas* into the well. Moreover, Munari fails to disclose that the injection tool has *plural* gas lift valves for delivering the injected gas into the well at a location below the sealing mechanism. Munari discloses just one injection device 6.

With respect to independent claim 14, Munari does not disclose a gas lift system or an injection tool to deliver gas from a surface location into the well. Moreover, Munari does not disclose a tubing string having a valve that is actuated in response to gas pressure in a well annulus outside the tubing string exceeding a predetermined level.

Dependent claims, including newly added dependent claims 15-23, are allowable for at least the same reasons as corresponding independent claims.

In view of the allowability of claim 7 over Munari, it is respectfully submitted that the obviousness rejection of claim 8 over Munari and Wellington has been overcome.

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Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 20-1504 (SHL.0343US).

Respectfully submitted,

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